

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**INTERROGATORY OF THE UNITED STATES POSTAL SERVICE TO
NATIONAL NEWSPAPER ASSOCIATION WITNESS DAVID BORDEWYK
(USPS/NNA-T2-16)**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following interrogatory to National Newspaper Association Witness David Bordewyk (NNA-T-2).

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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USPS/NNA-T2-16. Please refer to page 8, lines 2 through 7, of your testimony. There you state, "One theme resonated throughout these comments: South Dakotans oppose the proposed wholesale consolidation and closure of mail processing centers in our state and the discontinuation of Saturday mail delivery. Our state would suffer. Our economy would suffer. South Dakotans who depend on timely mail delivery for medical prescriptions, business mail, news, legal documents and much more would be negatively affected." Please also review page 53, lines 5 through 24, page 54, and page 55, lines 1 through 9 of the official transcript of the field hearings in Chicago, Illinois on Monday, June 21, 2010, in Docket No. N2010-1 (testimony of Ken Czarnecki, Senior Vice President, Caremark Mail Pharmacies), available at http://www.prc.gov/Docs/68/68858/Hearing__06-21-2010.pdf

- (A) Is there any reason to believe that South Dakota recipients of medicine delivered via the mail are not notified by their suppliers that their prescriptions need to be refilled? If your answer is affirmative, please state the basis for your answer.
- (B) Please state your understanding of the percentage of medical prescription shipments that are delivered to recipients in South Dakota by:
 - (i) Express Mail;
 - (ii) Priority Mail;
 - (iii) First-Class Mail;
 - (iv) Standard Mail; and
 - (v) Non-postal delivery service providers.
- (C) Assume hypothetically that the delivery time for First-Class Mail mailpieces containing prescription medicines is enlarged by one day in the rationalized mail processing network. Please confirm that, ceteris paribus, the recipient could avoid a delay in the receipt of his or her prescription-medication delivery by placing his or her order one day earlier than he or she would have placed it in the current mailing environment (*i.e.*, the status quo). If you do not confirm, please explain the basis for your response.